

**EXHIBIT “A”**

EICHEN CRUTCHLOW ZASLOW & McELROY  
EDWARD MCELROY, ESQ. ID#055771994  
563 Lakehurst Road  
Toms River, New Jersey 08755  
(732) 575-1400  
Attorneys for Plaintiff(s)

CIVIL RECORDS  
N.J. SUPERIOR COURT  
MIDDLESEX VICINAGE

2017 MAR -6 P 3:32

FILED & RECEIVED #5

JULIO F. HERNANDEZ	: SUPERIOR COURT OF NEW JERSEY
	: LAW DIVISION-MIDDLESEX COUNTY
	: DOCKET NO.: L
Plaintiff,	:
	: Civil Action
vs.	:
	: COMPLAINT, JURY DEMAND,
JOSEPH D. LIGHT, C&M TRUCK	: DEMAND FOR INTERROGATORIES,
REPAIR and JOHN DOES 1-10,	: SUPPLEMENTAL INTERROGATORIES
	: and NOTICE TO PRODUCE
Defendant	:

2-1482-17

Plaintiff, JULIO F. HERNANDEZ, residing in Middlesex County, New

Jersey, complaining of defendant, alleges and says:

**FIRST COUNT**

1. On the 14th day of September 2015, Plaintiff, JULIO F. HERNANDEZ, was the owner and operator of a motor vehicle which was traveling westbound on Talmadge Road, in the Township of Edison, Middlesex County, New Jersey.

2. At the time and place aforesaid, Defendant, JOSEPH D. LIGHT, was the operator of a motor vehicle owned by defendant C&M TRUCK REPAIR, which was traveling northbound on National Road, in the Township of Edison, Middlesex County, New Jersey.

3. Defendant so negligently and carelessly operated his motor vehicle so as to cause a collision to occur.

4. As a direct and proximate result of the of the negligence of Defendant, JOSEPH D. LIGHT, individually, jointly or severally, the plaintiff, JULIO F. HERNANDEZ, was caused to suffer injuries to his head, limbs and body; he was caused to suffer great pain and will be caused to suffer great pain in the future; he was caused to incur medical expenses and will be caused to incur medical expenses in the future; he was caused to lose time from his employment and will be caused to lose time from his employment in the future; and he was caused to suffer permanent injury.

WHEREFORE, Plaintiff, JULIO F. HERNANDEZ, demands judgment against Defendant, JOSEPH D. LIGHT, individually, jointly or severally, together with counsel fees and costs.

#### SECOND COUNT

1. Plaintiff repeats the allegations contained in the previous count and makes them a part hereof as though the same were more fully set forth herein and made a part hereof.

2. At the time aforesaid, defendant, C&M TRUCK REPAIR, was the owner of the motor vehicle operated by defendant, JOSEPH D. LIGHT.

3. As the result of the negligence of defendant, C&M TRUCK REPAIR, in permitting the use of said motor vehicle by defendant, JOSEPH D. LIGHT, plaintiff, JULIO F. HERNANDEZ, was permanently injured, suffered and will in the future suffer great pain and mental anguish, was required and will in the future be required to seek medical care and attention, and was prevented and will in the future be prevented from engaging in his usual pursuits and occupations.

4. As a result of permitting defendant, JOSEPH D. LIGHT, to operate said motor vehicle for his pleasure, business and /or family use, and/or as the agent of the defendant, C&M TRUCK REPAIR, defendant, C&M TRUK REPAIR, is or may be primarily and vicariously liable for the injuries sustained by the plaintiff, JULIO F. HERNANDEZ, and as the result of negligence, carelessness and recklessness of the permitted user, defendant, JOSEPH D. LIGHT.

WHEREFORE, plaintiff, JULIO F. HERNANDEZ, demands judgment against the defendant, C&M TRUCK REPAIR, for compensatory damages, together with interest, costs of suit and such other damages as the Court may deem just and appropriate.

#### THIRD COUNT

1. Plaintiff repeats the allegations contained in the previous counts and makes them a part hereof as though the same were more fully set forth herein and made a part hereof.

2. Plaintiff alleges there was a breach of motor vehicle and other statutes and that constitutes a statutory tort.

WHEREFORE, Plaintiff, JULIO F. HERNANDEZ, demands judgment against Defendants, JOSEPH D. LIGHT AND C&M TRUCK REPAIR, jointly, severally or in the alternative, together with counsel fees and costs.

#### FOURTH COUNT

1. Plaintiff repeats the allegations contained in the previous counts and makes them a part hereof as though the same were more fully set forth herein and made a part hereof.

2. As a direct result of the negligence of the defendant, JOHN DOES 1-10 (NAMES UNKNOWN), plaintiff, JULIO F. HERNANDEZ, was severely and permanently injured, suffered and in the future will experience great pain and suffering, did and in the future will be required to expend large sums of money for medical care and attention and has been and will in the future be disabled and prevented from attending to his necessary affairs and business.

WHEREFORE, plaintiff, JULIO F. HERNANDEZ, demands judgment against the defendant(s), JOHN DOES 1-10 (NAMES UNKNOWN), for damages interest and costs of suit.

**JURY DEMAND**

PLEASE TAKE NOTICE that Plaintiff, pursuant to R. 4:35-1, demands a trial by jury as to all issues.

**CERTIFICATION**

Pursuant to Rule 4:5-1, it is stated that the matter in controversy is not the subject to any other action pending in any other court or of a pending arbitration proceeding to the best of our knowledge and belief. Also, to the best of our belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, we know of no other parties that should be joined in the above action. In addition, we recognize the continuing obligation of each party to file and serve on all parties, and the Court, an amended certification if there is a change in the facts stated in this original Certification.

I further certify that confidential personal identifiers have been redacted from documents now submitted to the Court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

**NOTICE TO PRODUCE**

Pursuant to Rule 4:18-1, the plaintiff hereby demands that the defendants produce the following documents within thirty (30) days as prescribed by the Rules of Court. Additionally, please be advised that the following requests are ongoing and continuing in nature and the defendant is, therefore, required to continuously update its responses thereto as new information or documentation comes into existence.

1. The amounts of any and all insurance coverage covering the defendants, including but not limited to, primary insurance policies, secondary insurance policies and/or umbrella policies. For each such policy of insurance, supply a copy of the declaration page there from.

2. Copies of any and all documentation or reports, including but not limited to, police reports, accident reports and/or incident reports concerning the happening of the incident in question or any subsequent investigation of same.

3. Copies or duplicates of any and all photographs, motion pictures, videotapes, films, drawings, diagrams, sketches, or other reproductions, descriptions or accounts concerning the individuals involved in the accident in question, the property damage sustained, the accident scene, or anything else relevant to the incident in question.

4. Copies of any and all signed or unsigned statements, documents, communications and/or transmissions, whether in writing, made orally or otherwise recorded by any mechanical or electronic means, made by any party to this action, any witness, or any other individual, business, corporation, investigative authority, or other entity concerning anything relevant to the incident in question.

5. Copies of any and all documentation, including but not limited to, contracts between the owner of the property or product involved in the incident in question or any of the parties involved in this matter.

6. Copies of any and all discovery received from any other parties to the action in question.

7. Copies of any and all medical information and/or documentation concerning the plaintiff in this matter whether it concerns any medical condition or treatment which took place before, during or after the time of the incident in question.

8. Copies of any and all records of any type subpoenaed by the defendant or received from any other source concerning the plaintiff or the incident in question.

9. Provide the phone number, address and cell phone carrier of the defendant together with a copy of the bill for 1 month prior to the accident, the month of the accident and 2 months after the accident.

10. A complete copy of the property damage file for the defendant's vehicle.

**DESIGNATION OF TRIAL COUNSEL**

PLEASE TAKE NOTICE that pursuant to R.4:25-4, EDWARD MCELROY, is hereby designated as trial counsel in the above matter for the firm of Eichen Crutchlow Zaslow & McElroy, attorneys for the plaintiff.

**DEMAND FOR INTERROGATORIES**

DEMAND is hereby made on the defendants to answer fully and responsively Form C and Form C(1) uniform interrogatories, personal injury, Superior Court, found in Appendix II as provided by R.4:17-1(b)(ii) and the other applicable Rules of Court.

**EICHEN CRUTCHLOW ZASLOW & MCELROY**  
Attorneys for Plaintiff

BY: 

**EDWARD MCELROY**

Dated: March 3, 2017



Julio F. Hernandez v. Light, et als

**SUPPLEMENTAL AUTO INTERROGATORIES**

S1. Was any written report of the accident or any circumstances relating to the accident made by the defendant or to the defendant or any servant, agent, or employee of the defendant and if so, set forth the substance of the report and attach a copy hereto.

S2. Did the police or any governmental authority made a report of the accident and if so, set forth the substance of the report and attach a copy hereto.

S3. Does the defendant have possession of any photographs, motion pictures, videotapes or surveillance reports of the Plaintiffs and, if so, identify the contents of each and attach a copy hereto.

S4. Please state the name/s of the individuals or agencies who are responsible for repairing and/ or maintaining the automobile.

S5. Does the defendant contend that the Plaintiff's injuries were caused by another accident or some other physical condition, disease or injury and, if so, set forth the nature of and attach a copy of all written documents relating thereto that are in the possession of the defendant.


S6. Does the defendant intend to produce the testimony at trial of any expert witnesses, including the treating physicians or any persons who have conducted an examination pursuant to Rule 4:19 and, if so, set forth the names and addresses of the witnesses, their area of expertise, the subject matter on which they are expected to testify, the substance of the facts and opinions on which they are expected to testify and a summary of the grounds of each opinion and attach a true copy of all written reports provided to you by such witnesses and a summary of any oral report.

**CERTIFICATION**

I hereby certify that the copies of the reports annexed hereto rendered by either treating physicians or proposed expert witnesses are exact copies of the entire report or reports rendered by them; that the existence of other reports of said doctors or experts, written or oral, are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

Date: \_\_\_\_\_

## Appendix XII-B1

	<b>CIVIL CASE INFORMATION STATEMENT</b> <b>(CIS)</b>		CIVIL RECO MIDDLESEX VICTIM		FOR USE BY CLERK'S OFFICE ONLY PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA OFFICE NO.
	Use for Initial Law Division - 2017 MAR -6 Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 4:5-6(c) if information above the black bar is not completed or attorney's signature is not affixed				AMOUNT OVERPAYMENT: BATCH NUMBER:
ATTORNEY / PRO SE NAME EDWARD MCELROY, ESQ.		TELEPHONE NUMBER (732) 575-1400		COUNTY OF VENUE Middlesex	
FIRM NAME (if applicable) EICHEN CRUTCHLOW ZASLOW & MCELROY		DOCKET NUMBER (when available) 2-1482-17		DOCUMENT TYPE COMPLAINT	
OFFICE ADDRESS 563 LAKEHURST ROAD, TOMS RIVER, NJ 08755		JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
NAME OF PARTY (e.g., John Doe, Plaintiff) JULIO F. HERNANDEZ		CAPTION JULIO F. HERNANDEZ V. JOSEPH D. LIGHT, ET ALS			
CASE TYPE NUMBER (See reverse side for listing) 603N	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.			
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS			
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN			
<b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>					
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION					
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS			
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION					
Do you or your client need any disability accommodations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION			
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, FOR WHAT LANGUAGE?			
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).					
ATTORNEY SIGNATURE:					

Side 2



# CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

**CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)

**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 389 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 899 OTHER (briefly describe nature of action)

**Track II - 300 days' discovery**

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

**Track III - 450 days' discovery**

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

**Track IV - Active Case Management by Individual Judge / 450 days' discovery**

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

**Multicounty Litigation (Track IV)**

- |  |   |
|--|---|
| 271 ACCUTANE/ISOTRETINOIN                  | 292 PELVIC MESH/BARD                                      |
| 274 RISPERDAL/SEROQUEL/ZYPREXA             | 293 DEPUY ASR HIP IMPLANT LITIGATION                      |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL     | 295 ALLODERM REGENERATIVE TISSUE MATRIX                   |
| 282 FOSAMAX                                | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS           | 297 MIRENA CONTRACEPTIVE DEVICE                           |
| 286 LEVAQUIN                               | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR              |
| 287 YAZ/YASMIN/OCELLA                      | 300 TALC-BASED BODY POWDERS                               |
| 289 REGLAN                                 | 601 ASBESTOS  |
| 280 POMPTON LAKES ENVIRONMENTAL LITIGATION | 623 PROPECIA  |
| 291 PELVIC MESH/GYNECARE                   |   |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 69

MIDDLESEX VICINAGE CIVIL DIVISION  
P O BOX 2633  
56 PATERSON STREET  
NEW BRUNSWICK NJ 08903-2633

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 519-3728  
COURT HOURS 8:30 AM - 4:30 PM

DATE: MARCH 13, 2017  
RE: HERNANDEZ JULIO F VS LIGHT JOSEPH D  
DOCKET: MID L -001482 17

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS  
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON ANDREA CARTER

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003  
AT: (732) 519-3745 EXT 3745.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A  
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.  
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE  
WITH R.4:5A-2.

ATTENTION:

ATT: EDWARD MCELROY  
EICHEN CRUTCHLOW ZASLOW & MCRL  
563 LAKEHURST RD  
TOMS RIVER NJ 08755-8044

JUMGHAO

**EXHIBIT “B”**

96	Page 1 of 1	<input type="checkbox"/> Fatal	New Jersey Police Crash Investigation Report										Reportable	<input type="checkbox"/> Non-Reportable	<input type="checkbox"/> Change Report																		
05	1 Case Number	15043855										10 Crash Occurred On:	TALMADGE ROAD	11 Speed Limit	40																		
01	2 Police Dept of	Edison Police										Code	01	12 Route No.	Suffix	13 Milepost	215																
01	3 Station/Precinct											14	15	16	17 Cross Road Name	NB	EB																
07	4 Date of Crash	09	14	15	6 Day of Week	Su	Tu	W	Th	F	Sa	6 Time (use 2400 hrs)	08:07	7 Municipality Code	1205	8 Total Killed	9 Total Injured																
01	23 Veh No	24 Policy No.	01469479-1										25 Ins Code	413	53 Veh No	54 Policy No.	192552755																
02	1	<input type="checkbox"/> Parked	<input type="checkbox"/> Ped	<input type="checkbox"/> Pedalcyclist	<input type="checkbox"/> Resp to Emergency	<input type="checkbox"/> Hit & Run	26 Driver's First Name	Initial	Last Name	29 Sex	56 Driver's First Name	Initial	Last Name	59 Sex																			
01	JOSEPH	D	LIGHT	M	JULIO	F	HERNANDEZ	M																									
01	27 Number and Street	8321 21ST AVE APT 3										30 Eyes	4	57 Number and Street	417 PORT READING AVE																		
02	28 City	BROOKLYN										State	NY	Zip	11214	58 City	POERT READING																
03	31 State	32 Drivers License No	197353244										33 DOB	mm dd yy	11	18	1989	34 Expires	mm yy	11	20	61 State	62 Drivers License No	H27184206609752									
03	NY	197353244	35 Owner's First Name	Initial	Last Name	65 Owner's First Name	Initial	Last Name																									
03	C & M	TRUCK REPAIR	JULIO	F	HERNANDEZ																												
03	36 Number and Street	152 INDUSTRIAL LOOP										66 Number and Street	417 PORT READING AVE																				
03	37 City	STATEN ISLAND										State	NY	Zip	10309	67 City	POERT READING																
03	38 Make	39 Model	40 Color	41 Year	42 Plate No.	43 State	68 Make	69 Model	70 Color	71 Year	72 Plate No.	73 State																					
03	FORD	Pkup	WT	2006	A992UV	NY	TOY	CAM	BK	2009	Z37DBF	NJ																					
05	44 VIN	1FTYR10D36PA02830										45 Expires	08	17	74 VIN	4T1BE46K49U817497																	
01	46 Vehicle Removed To	<input checked="" type="checkbox"/> Driven	<input type="checkbox"/> Left at Scene	<input type="checkbox"/> Towed	<input type="checkbox"/> Impound	<input type="checkbox"/> Disabled	47 Authority	<input type="checkbox"/> Owner	<input type="checkbox"/> Driver	<input type="checkbox"/> Police	76 Vehicle Removed To	<input checked="" type="checkbox"/> Driven	<input type="checkbox"/> Left at Scene	<input type="checkbox"/> Towed	<input type="checkbox"/> Impound	<input type="checkbox"/> Disabled	77 Authority	<input type="checkbox"/> Owner	<input type="checkbox"/> Driver	<input type="checkbox"/> Police													
02	ROADWAY											ROADWAY																					
02	48 Alcohol/Drug Test	Given: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Refused										78 Alcohol/Drug Test	Given: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Refused																				
01	Type: <input type="checkbox"/> Breath <input type="checkbox"/> Blood <input type="checkbox"/> Urine											Type: <input type="checkbox"/> Breath <input type="checkbox"/> Blood <input type="checkbox"/> Urine																					
01	Results: <input type="checkbox"/> Pending											Results: <input type="checkbox"/> Pending																					
01	49 Hazardous Material	On Board <input type="checkbox"/> Spill <input type="checkbox"/>										79 Hazardous Material	On Board <input type="checkbox"/> Spill <input type="checkbox"/>																				
01	60 Carrier No. <input type="checkbox"/> USDOT <input type="checkbox"/> Other*											80 Carrier No. <input type="checkbox"/> USDOT <input type="checkbox"/> Other*																					
03	61 Commercial Vehicle Weight	<input type="checkbox"/> ≤ 10,000 lbs										81 Commercial Vehicle Weight	<input type="checkbox"/> ≤ 10,000 lbs																				
03	<input type="checkbox"/> 10,001 - 26,000 lbs											<input type="checkbox"/> 10,001 - 26,000 lbs																					
04	<input type="checkbox"/> ≥ 26,001 lbs											<input type="checkbox"/> ≥ 26,001 lbs																					
04	82 Carrier name											82 Carrier name																					
04	135 Crash Description	Driver #2 stated that he was traveling westbound on Talmadge Road when vehicle #1, which was attempting to make a left turn from National Road, entered into his lane of travel and this resulted in V#1 impacting the side of V#2. Driver #1 stated that traffic on Talmadge Rd. westbound had stopped and D#1 attempted to make a left turn from National Rd. when D#2, which was passing stopped vehicles, impacted V#1. Investigation revealed D#1 to be at fault; no injuries reported on scene.																															
04	136 Damage To Other Property																																
04	137 Charge	<input type="checkbox"/> Multiple Charges										138 Summons No.	F-883810																				
04	139 Charge	<input type="checkbox"/> Multiple Charges										140 Summons No.																					
04	141 Officer's Signature	Patrolman M. Gurovich										142 Badge No.	0388																				
04	143 Reviewed By	DuChirico										144 Case Status	<input type="checkbox"/> Pending <input checked="" type="checkbox"/> Complete																				
04	Names & Addresses of Occupants - If Deceased, Date & Time of Death																																
A	1	1	1	-	25	M	-	-	9	4	-	SAME AS DRIVER # 1																					
B	2	1	1	-	40	M	-	-	9	4	-	SAME AS DRIVER # 2																					
C	-	-	-	-	-	-	-	-	-	-	-																						
D	-	-	-	-	-	-	-	-	-	-	-																						
E	-	-	-	-	-	-	-	-	-	-	-																						



Updated 03/10/05

Align with top edge of Report - 9/16" from top of this overlay

Cut here 2/162" from left

95	Road Divided By 01 Barrier Median 02 Curbed Median 03 Grass Median 04 Painted Median 05 None
96	Temporary Traffic Control Zone 01 None 02 Construction Zone 03 Maintenance Zone 04 Utility Zone 05 Incident Zone
97	Light Condition 01 Daylight 03 Dusk 05 Dark (no street lights) 07 Dark (street lights on, spot) 02 Dawn 04 Dark (street lights off) 06 Dark (street lights on, continuous)
98	Road System 01 Interstate 03 State/Interstate Authority 05 County 07 Municipal 09 Private Property 02 State Highway 04 State Park or Institution 08 Co Auth, Park or Inst 10 US Govt Property
99	Road Character 01 Straight and Level 03 Straight at Hillcrest 05 Curve and Grade 02 Straight and Grade 04 Curve and Level 06 Curve at Hillcrest
100	Road Surface Type 01 Concrete 02 Blacktop 03 Gravel 04 Steel Grid 05 Dirt
101	Road Surface Condition 01 Dry 02 Wet 03 Snowy 04 Icy 05 Slush 06 Water (Standing/Moving) 07 Sand, Mud, Dirt 08 Oil
102	Environmental Condition 01 Clear 03 Snow 05 Overcast 07 Blowing Snow 09 Severe Crosswinds 02 Rain 04 Fog/Smog/Smoke 06 Steel/Hail/Freezing Rain 08 Blowing Sand/Dirt
103	Total Number of Motor Vehicles Involved in Crash
104	Crash Type with Other MV as First Event 01 Same Direction (Rear End) 07 Left Turn / U Turn 02 Same Direction (Side Swipe) 08 Backing 03 Right Angle 09 Encroachment 04 Opposite Direction (Head On, Angular) 05 Opposite Direction (Side Swipe) 06 Struck Parked Vehicle with Below as First Event 10 Overturned 11 Fixed Object 12 Animal 13 Pedestrian 14 Pedalcyclist 15 Non-fixed Object 16 Railcar - vehicle
105 Veh 1	Vehicle 1 Oversize/Overweight Permit? (Comm Veh Only) 01 Yes 02 No
106 Veh 2	Vehicle 2 Vehicle Type 01 Car/Station Wagon/Minivan 06 Recreational Vehicle 11 Moped 02 Passenger Van (< 9 Seats) 07 All Terrain Vehicle 12 Streetcar/Trolley 03 Cargo Van (10K lbs or less) 08 Motorcycle 13 Pedalcycle 04 Sport Utility Vehicle 09 (reserved) 05 Pickup 10 any previous w/Trailer 19 Other Pass Vehicle 29 Other Truck
107 Veh 1	Vehicle Use 01 Personal 03 Government 02 Business/Commerce 04 Responding to Emergency 05 Machinery in Use
108 Veh 2	Special Function Vehicles 01 Work Equipment 06 Taxi/Limo 11 Other Bus 02 Police 07 Veh Used as School Bus 12 Veh Used as Snowplow 03 Military 08 Veh Used as Other Bus 13 Vehicle Towing Another Veh 04 Fire/Rescue 09 School Bus 05 Ambulance 10 Transit Bus
109 Veh 1	Cargo Body Type (Comm Veh Only) 01 Bus (9-15 seats) 04 Cargo Tank 07 Concrete Mixer 11 Pole (Trailer) 02 Bus (> 15 seats) 05 Flatbed 08 Auto Transporter 12 Intermodal Chassis 03 Van/Enclosed Box 06 Dump 09 Garbage/Refuse 13 No Cargo Body 10 Hopper (grain, gravel, chips)
110 Veh 2	Direction of Travel of Vehicle 01 North 02 East 03 South 04 West
111 Veh 1	Location of Most Severe Physical Injury 01 Head 07 Shoulder / Upper Arm 02 Face 08 Elbow / Lower Arm / Hand 03 Eye 09 Abdomen / Pelvis 04 Neck 10 Hip / Upper Leg 05 Chest 11 Knee / Lower Leg / Foot 06 Back 12 Entire Body
112 Veh 2	Type of Most Severe Physical Injury 01 Amputation 06 Burn 02 Concussion 07 Fracture / Dislocation 03 Internal 08 Complaint of Pain 04 Bleeding 05 Contusion/Bruise/Abrasion
113 Veh 1	Which Vehicle Occupied 1 Vehicle 1 B Pedalcycle 2 Vehicle 2 P Pedestrian O Other
114 Veh 2	Position In/On Vehicle 01 Driver 02 thru 09 Passengers 10 Cargo Area 11 Riding/Hanging on Outside
115 Veh 1	Ejection From Vehicle 01 Not Ejected 03 Ejected 02 Partial Ejection 04 Trapped
116 Veh 2	Victim's Physical Condition 01 Killed 02 Incapacitated 03 Moderate Injury 04 Complaint of Pain
117 Veh 1	Age Sex
118 Veh 2	Refused Medical Treatment 1 Yes 2 No
119 Veh 1	Safety Equipment 01 None 08 Airbag 02 Lap Belt 09 Airbag & Seatbelts 03 Harness 10 Safety Vest (Ped only) 04 Lap Belt 05 Child Restraint 06 Helmet
120 Veh 2	Airbag Deployment 01 Front 07 Other 02 Side 08 Multiple
121 Veh 1	Avail Used Hosp Code
122 Veh 2	

Cut here 1 5/16" from bottom

# State of New Jersey Police Crash Investigation Report NJTR-1

Use Code 00 for Unknown.

Use Code 99 for Other.

Explain Other in Crash Description

Also, Explain Items Marked with  
asterisk (\*) in Crash DescriptionIf an Item Does Not Apply, Enter a  
Dash (-)**NOTE:**Boxes 1 - 7 must be completed for all  
pages of the report.Boxes 8-22 and 96-105 are only  
required on page 1 of the report.All other information is completed as  
necessary.**Websites for:****Crash References -**  
<http://www.state.nj.us/transportation/weldata/accidents/policeres/shim>**Insurance Codes -**  
5 digit NAIC - <http://www.nj.gov/doh/data/inscomp.htm>  
3 digit MVC - <http://www.state.nj.us/mvc/numeric.pdf>**Hospital Codes**  
- <http://www.state.nj.us/health/fems/fems.pdf>

Overlay Page 1 of 2

Cut here 1 5/16" from bottom

Cutting at designated positions will permit arrows on each side to be displayed when the appropriate overlay is paged. It will also permit the first overlay to be slightly longer than the second for easy paging.

Printing should be done Portrait, Duplex, Flip on Short Edge



Align with top edge of Report 1/2" from top of this overlay

State of New Jersey  
Police Crash  
Investigation  
Report NJTR-1

Use Code 00 for Unknown.

Use Code 99 for Other.

Explain Other In Crash  
DescriptionAlso, Explain Items  
Marked with asterisk (\*) in  
Crash DescriptionIf an Item Does Not Apply,  
Enter a Dash (-)

## Eye Color (box 30, 60)

1 - Black 4 - Blue  
2 - Brown 5 - Hazel  
3 - Gray 6 - Green  
7, 8, and 9 = Other

Vehicle Color Codes  
(box 40, 70)

Beige BG  
Black BK  
Blue BL  
Brown BN  
Coral CL  
Cream CM  
Gold GD  
Gray GY  
Green GN  
Maroon MN  
Orange OG  
Pink PK  
Purple PL  
Red RD  
Silver SL  
Tan TN  
Turquoise TQ  
White WT  
Yellow YL

Overlay Page 2 of 2

## Apparent Contributing Circumstances

## Driver/Pedalcyclist Actions (01 - 29)

01 Unsafe Speed  
02 Driver Inattention  
03 Failed To Obey Traffic Control Device  
04 Failed To Yield ROW to Vehicle/Pedest.  
05 Improper Lane Change  
06 Improper Passing  
07 Improper Use/Failed to Use Turn Signal  
08 Improper Turning  
09 Following Too Closely  
10 Backing Unsafely  
11 Improper Use/No Lights  
12 Wrong Way  
13 Improper Parking  
14 Failure To Keep Right  
25 None  
29 Other Driver/Pedalcyclist Action

## Vehicle Factors (31 - 49)

31 Defective Lights  
32 Brakes  
33 Steering  
34 Tires  
35 Wheels  
36 Windows/Windshield  
37 Mirrors  
38 Wipers  
39 Veh Coupling/Hitch/Safety Chains  
49 Other Vehicle Factor

## Road / Environ. Factors (51 - 60)

51 Road Surface Condition  
52 Obstruction/Debris in Road  
53 Ruts, Holes, Bumps  
54 Control Device Defective or Missing  
55 Improper Work Zone  
56 Physical Obstructions (viewing, etc)  
57 Animals in Roadway  
58 Improper/Inadequate Lane Markings  
59 Sun glare  
60 Other Roadway Factors

## Pedestrian Factors (71 - 89)

71 Failed To Obey Traffic Control Device  
72 Crossing Where Prohibited  
73 Dark Clothing/Low Visibility to Driver  
74 Inattentive  
75 Failure to Yield ROW  
76 Walking on Wrong Side of Road  
77 Walking in Road When Sidewalk Present  
78 Running/Darting Across Traffic  
85 None  
89 Other Pedestrian Factors

## Apparent Physical Status

01 Apparently Normal  
02 Alcohol Use  
03 Drug Use (Illicit)  
04 Medication  
05 Alcohol & Drug/Medication Use  
06 Physical Handicaps  
07 Illness  
08 Fatigue  
09 Fell Asleep

## Cell Phone In Use By Driver

01 Handheld  
02 Hands Free

## Vehicle / Pedalcyclist Action (01-29)

01 Going Straight Ahead  
02 Making Right Turn  
(not turn on red)  
03 Making Left Turn  
04 Making U Turn  
05 Starting From Parking  
06 Starting In Traffic  
07 Stopping or Stopping  
08 Stopped In Traffic  
09 Parking  
10 Parked  
11 Changing Lanes  
12 Merging/Entering Traf Lane  
13 Backing  
14 Driverless / Moving  
15 Passing  
16 Negotiating Curve  
17 Driving on Shoulder  
18 Right Turn on Red  
29 Other Veh/Cyclist Action

## Pedestrian Action (31-49)

31 Pedestrian Off Road  
32 Walking To/From School  
33 Walking/Jogging with Traffic  
34 Walking/Jogging Against Traffic  
35 Playing in Road  
36 Standing/Lying/Kneeling in Road  
37 Getting On/Off Vehicle  
38 Pushing/Working on Vehicle  
39 Other Working in Roadway  
40 Approaching/Leaving Schoolbus  
41 Coming From Behind Parked Veh.  
42 (reserved)  
49 Other Pedestrian Action

## Pre-Crash Action

43 Crossing at "marked"  
Crosswalk  
44 Crossing at "unmarked"  
Crosswalk  
45 Crossing at "marked"  
Crosswalk  
46 Crossing / Jaywalking

01 Police Officer  
02 RR Watchman, Gates, etc  
03 Traffic Signal  
04 Lane Markings

05 Channelization - Painted  
06 Channelization - Physical  
07 Warning Signal  
08 Stop Sign

09 Yield Sign  
10 Flagman  
11 No Control Present  
12 Flashing Traffic Control

## Traffic Controls

13 School Zone (Signs/Controls)  
14 Adult Crossing Guard

## Sequence of Events (select up to 4 for each vehicle)

## Non Collision (01 - 19)

01 Overtake / Rollover  
02 Fire / Explosion  
03 Immersion  
04 Jackknife  
05 Ran Off Road - Right  
06 Ran Off Road - Left  
07 Crossed Median / Centerline  
08 Downhill Runaway  
09 Cargo / Equipment Loss or Shift  
10 Separation of Units  
11 Fell / Jumped From Vehicle  
12 Thrown / Falling Object  
13 Equipment Failure  
19 Other Non Collision

Collision w/ Person, MV, or Non-Fixed  
Object (21 - 39)

21 Pedalcyclist  
22 Pedestrian  
23 Train / Trolley / Other Railcar  
24 Deer  
25 Other Animal  
26 MV In Transport  
27 MV In Transport, Other Roadway  
28 Parked MV  
29 Work Zone or Maint. Equipment  
30 Struck By Object Set In Motion By MV  
39 Other Non-Fixed Object

## Collision w/ Fixed Object (41 - 69)

41 Impact Attenuator / Crash Cushion  
42 Bridge Overhead Structure  
43 Bridge Pier or Support  
44 Bridge Parapet End  
45 Bridge Rail  
46 Guardrail Face  
47 Guardrail End  
48 Concrete Traffic Barrier  
49 Other Traffic Barrier  
50 Traffic Sign Support  
51 Traffic Signal Standard  
52 Utility Pole  
53 Light Standard  
54 Other Post, Pole, Support  
55 Culvert  
56 Curb  
57 Ditch  
58 Embankment  
59 Fence  
60 Tree  
61 Mailbox  
62 Fire Hydrant  
69 Other Fixed Object

## Clockpoint Diagram



13 Roof  
14 Undercarriage  
15 Overtumed  
17 None Visible

## Vehicle Impact Area

Initial Impact  
Principal Damage  
Initial Impact  
Principal Damage

Cut here second 1 1/8" from left

Cut here first 3 1/16" from left

Cut here 1 9/16" from bottom

**EXHIBIT “C”**

**EICHEN CRUTCHLOW ZASLOW & MCELROY**

**EDWARD MCELROY, ESQ. (055771994)**

563 Lakehurst Road

Toms River, New Jersey 08755

(732) 575-1400

Attorneys for Plaintiff

**JULIO F. HERNANDEZ**

Plaintiff,

vs.

**JOSEPH D. LIGHT, C&M TRUCK :**

**REPAIR and JOHN DOES 1-10, :**

Defendant

: SUPERIOR COURT OF NEW JERSEY  
: LAW DIVISION-MIDDLESEX COUNTY  
: DOCKET NO.: L 1482 17

Civil Action

SUMMONS

**THE STATE OF NEW JERSEY, TO THE ABOVE NAMED DEFENDANT(S):**

**C&M TRUCK & TIRE REPAIR**

The plaintiff named above has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the Complaint is in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ, 08625. A filing fee of \$250.00 for Law Division cases or \$175.00 for Chancery Division cases payable to the Treasurer State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and service a written answer or motion (with fee and completed Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the Court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.






DATED: March 20, 2017

/s/ MICHELLE M. SMITH

MICHELLE M. SMITH, Clerk, Superior Court

Name of Defendant to be served: **C&M TRUCK & TIRE REPAIR, 152 INDUSTRIAL LOOP, SI, NY 10309**

EICHEN CRUTCHLOW ZASLOW & MCELROY, LLP  
ATTORNEYS AT LAW

BARRY R. EICHEN   
WILLIAM O. CRUTCHLOW   
DARYL L. ZASLOW   
EDWARD MCELROY  
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Fax: (732) 281-5591

[www.njadvocates.com](http://www.njadvocates.com)

AFFILIATE OFFICES:  
POISON  
RBO BANK

March 20, 2017

**VIA CERTIFIED & REGULAR MAIL -- 7015 1730 0001 2791 9232**

C&M Truck & Tire Repair  
152 Industrial Loop  
Staten Island, NY 10309

Re: Julio F. Hernandez v. Light & C&M Truck Repair  
Docket No.: MID L 1482 17

Dear Sir:

Service is hereby being made upon you of the enclosed Summons and Complaint in regard to the above-captioned matter. In accordance with the Court Rules, please be advised that you have 35 days within which to file an Answer to same.

Kindly turn these documents over to your insurance carrier and have them file an Answer on your behalf at your earliest convenience.

Thank you.

Very truly yours,

  
EDWARD MCELROY

EM:hr  
Enc.

**EXHIBIT “D”**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
(Newark Vicinage)**

---

JULIO F. HERNANDEZ,

Plaintiff,

v.

JOSEPH D. LIGHT; C&M TRUCK REPAIR; and  
JOHN DOES (1-10) (fictitious names),

Defendants.

---

Civil Action No.:

**ANSWER AND SEPARATE DEFENSES, OF DEFENDANTS, JOSEPH D. LIGHT AND C&M  
TRUCK REPAIR**

Defendants, Joseph D. Light and C&M Truck Repair, LLC (hereinafter referred to as “Defendants”), by way of Answer to the plaintiff’s, Julio F. Hernandez (“Mr. Hernandez” or “Plaintiff”), Complaint hereby responds and says:

**FIRST COUNT**

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

2. Admitted.

3. Denied.

4. Denied.

**WHEREFORE** Defendants, Joseph D. Light and C&M Truck Repair, LLC, hereby demands dismissal of the Complaint with prejudice, and respectfully requests that the Court enter a judgment in its favor and against the Plaintiff for attorneys’ fees and costs and any other relief that this Court deems just and appropriate.

**SECOND COUNT**

1. Defendants hereby incorporate its answers to the proceeding paragraphs of the Complaint as if set forth at length herein.

2. Admitted.

3. Denied.

4. Denied.

**WHEREFORE** Defendants, Joseph D. Light and C&M Truck Repair, LLC, hereby demands dismissal of the Complaint with prejudice, and respectfully requests that the Court enter a judgment in its favor and against the Plaintiff for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

**THIRD COUNT**

1. Defendants hereby incorporate its answers to the proceeding paragraphs of the Complaint as if set forth at length herein.

2. Denied.

**WHEREFORE** Defendants, Joseph D. Light and C&M Truck Repair, LLC, hereby demands dismissal of the Complaint with prejudice, and respectfully requests that the Court enter a judgment in its favor and against the Plaintiff for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

**FOURTH COUNT**

1. Defendants hereby incorporate its answers to the proceeding paragraphs of the Complaint as if set forth at length herein.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

**WHEREFORE** Defendants, Joseph D. Light and C&M Truck Repair, LLC, hereby demands dismissal of the Complaint with prejudice, and respectfully requests that the Court enter a judgment in its

favor and against the Plaintiff for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

**SEPARATE DEFENSES**

1. The Complaint fails to state a claim upon which relief can be granted, and Defendants reserve the right to move to dismiss.

2. Plaintiff's claims as against Defendants, as referenced in the Complaint, are barred in whole or in part, by the doctrine of laches.

3. Plaintiff's claims as against Defendants, as referenced in the Complaint, are barred in whole or in part, by the doctrine of waiver.

4. Plaintiff has not joined all parties necessary for the adjudication of this action, and Defendants reserve the right to move to dismiss.

5. Plaintiff's claims as against Defendants, as referenced in the Complaint, are barred in whole or in part, by the doctrine of accord and satisfaction.

6. Plaintiff's claims as against Defendants, as referenced in the Complaint, are barred in whole or in part, by the doctrine of estoppel.

7. Plaintiff's claims as against Defendants, as referenced in the Complaint, are barred in whole or in part, by the doctrine of unclean hands.

8. Defendants were not negligent.

9. Defendants performed each and every duty owed to the Plaintiff, if any.

10. Recovery is barred or precluded by Plaintiff's own negligence.

11. Plaintiff's claims are barred, limited or diminished and reduced by the doctrine of comparative negligence under the New Jersey Comparative Negligence Act, N.J.S.A. 2A:15-5.1 *et seq.*

12. Plaintiff's claims are barred, limited or diminished and reduced by New Jersey's Joint Tortfeasor Contribution Act, N.J.S.A. 2A:53A-1, *et seq.*

13. Defendants deny proximate cause.



14. At the time and place set forth in Plaintiff's Complaint, the Plaintiff assumed the risk of the conduct in which they were engaging and, accordingly, this action is barred.

15. Defendants deny any claim for strict liability, if any.

16. Defendants deny any claim for compensatory and/or punitive damages.

17. Plaintiff's claims are barred in whole, or in part, by the applicable statute of limitations.

18. Any and all injuries or damages alleged to have been suffered by the Plaintiff were caused solely by the negligence of independent third parties over whom the Defendants exerted no control.

19. Plaintiff's claims were caused, in whole or in part, by his failure to make proper use of their vehicle's safety devices, including, but not limited to, a seatbelt.

20. Plaintiff's claims are barred, in whole or in part, by the Collateral Source Rule. *See* N.J.S.A. 2A:15-97.

21. Recovery is barred, precluded or diminished by Plaintiff's failure to mitigate damages.

22. This case is barred, in whole or in part, by the doctrine of avoidable consequences.

23. This case is barred, in whole or in part, by the entire controversy doctrine.

24. This case is barred, in whole or in part, by the doctrine of *res judicata*.

25. This case is barred, in whole or in part, by the doctrine of joint enterprise.

26. This case is barred, in whole or in part, because Plaintiff lacks standing.

27. This case is barred, in whole or in part, because the dispute is moot.

28. This case is barred, in whole or in part, by lack of jurisdiction.

29. The Summons, or service thereof, is defective and Defendants reserve the right to move to quash service of process of dismiss the Complaint.

30. This case is barred because of Plaintiff's failure to join an indispensable party without whom this action cannot proceed.

31. This action is barred because of insufficiency of process.

32. Plaintiff's claims are barred in whole, or in part, by any and all applicable federal and state statutes and regulations pertaining to interstate commerce, trucking and special hauling permits.

33. Plaintiff's claim is barred in whole, or in part, by F.R.C.P. 11 (b), and, as presented, is frivolous, improper, intended to harass, is unwarranted, baseless and is lacking in evidentiary support, and as a result, Defendants are entitled to sanctions.

**DEMAND FOR JURY TRIAL**

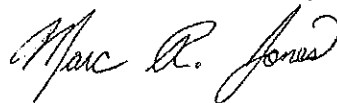
Defendants, Joseph D. Light and C&M Truck Repair, LLC, and hereby demands a trial by jury as to all issues.

**CERTIFICATION**

I certify that the matter in controversy is not the subject of any other pending action. I know of no other parties to be joined at this time other than those named herein.

I am aware that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**CIPRIANI & WERNER, P.C.**



---

MARC R. JONES, ESQUIRE (NJ#016022001)  
Attorneys for Defendants – Joseph D. Light and C&M Truck  
Repair  
155 Gaither Drive – Suite B  
Mount Laurel, NJ 08054  
856-761-3800  
[mjones@c-wlaw.com](mailto:mjones@c-wlaw.com)

DATED: April 3, 2017

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
(Newark Vicinage)**

---

JULIO F. HERNANDEZ,

Plaintiff,

v.

JOSEPH D. LIGHT; C&M TRUCK REPAIR; and  
JOHN DOES (1-10) (fictitious names),

Defendants.

---

Civil Action No.:

**CERTIFICATION OF FILING AND SERVICE OF ANSWER AND SEPARATE DEFENSES ON  
BEHALF OF DEFENDANTS, JOSEPH D. LIGHT AND C&M TRUCK REPAIR**

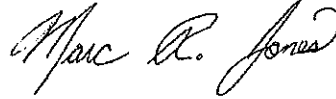
The undersigned hereby certifies and confirms that the Answer and Separate Defenses on behalf of the defendants, Joseph D. Light and C&M Truck Repair, was e-filed with the United States District Court of New Jersey on \_\_\_\_\_ and that a hard copy was also sent to counsel for Plaintiff via Priority Mail at the following address:

Edward McElroy, Esquire  
Eichen, Crutchlow, Zaslow & McElroy  
563 Lakehurst Road  
Toms River, NJ 08755  
[emcelroy@njadvocates.com](mailto:emcelroy@njadvocates.com)  
**Attorneys for Plaintiff – Julio F. Hernandez**

I am aware that the foregoing statements made by me are true.

I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**CIPRIANI & WERNER, P.C.**



---

MARC R. JONES, ESQUIRE (NJ#016022001)  
Attorneys for Defendants – Joseph D. Light and C&M Truck  
Repair  
155 Gaither Drive – Suite B  
Mount Laurel, NJ 08054  
856-761-3800  
[mjones@c-wlaw.com](mailto:mjones@c-wlaw.com)

DATED: April 3, 2017